

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

AMIN KHOURY,

Defendant

Case No. 20-cr-10177-PBS

**DEFENDANT AMIN KHOURY'S AMENDED EXHIBIT LIST**

Defendant Amin Khoury respectfully submits the following amended list of potential exhibits to be used in Mr. Khoury's case-in-chief for the May 2022 trial. Mr. Khoury further reserves the right to rely upon any exhibits identified by the government, without waiving any rights to dispute the admissibility or relevance of any exhibits on the government's list. Finally, Mr. Khoury reserves the right to supplement this list with reasonable notice to the government.<sup>1/</sup>

<b>Exhibit</b>	<b>Bates Begin</b>	<b>Bates End</b>
1	USAO-VB-00811011	USAO-VB-00811012
2	USAO-VB-00811276	USAO-VB-00811277
3	USAO-VB-00812761	USAO-VB-00812762
4	USAO-VB-00813448	USAO-VB-00813448
5	USAO-VB-00813475	USAO-VB-00813476
6	USAO-VB-00813548	USAO-VB-00813549
7	USAO-VB-00814565	USAO-VB-00814568
8	USAO-VB-00816885	USAO-VB-00816886
9	USAO-VB-00818621	USAO-VB-00818621
10	USAO-VB-00819945	USAO-VB-00819945
11	USAO-VB-00821165	USAO-VB-00821166
12	USAO-VB-00826362	USAO-VB-00826364

<sup>1/</sup> Mr. Khoury relied upon the government's witness and exhibits list produced on February 18, 2022 in preparing his witness and exhibit list and anticipates that the government will call all of the witnesses on its witness list. Should the government fail to call one of the witnesses on its list, Mr. Khoury specifically reserves the right to call that individual and supplement his witness and exhibit lists accordingly.

<b>Exhibit</b>	<b>Bates Begin</b>	<b>Bates End</b>
13	USAO-VB-00835264	USAO-VB-00835265
14	USAO-VB-00840295	USAO-VB-00840296
15	USAO-VB-00840297	USAO-VB-00840297
16	USAO-VB-00846462	USAO-VB-00846464
17	USAO-VB-00847528	USAO-VB-00847529
18	USAO-VB-00847530	USAO-VB-00847530
19	USAO-VB-00848949	USAO-VB-00848949
20	USAO-VB-00849715	USAO-VB-00849718
21	USAO-VB-00850925	USAO-VB-00850926
22	USAO-VB-00852025	USAO-VB-00852025
23	USAO-VB-00852026	USAO-VB-00852026
24	USAO-VB-00852027	USAO-VB-00852027
25	USAO-VB-00854089	USAO-VB-00854089
26	USAO-VB-00854190	USAO-VB-00854193
27	USAO-VB-00858232	USAO-VB-00858233
28	USAO-VB-00863087	USAO-VB-00863088
29	USAO-VB-00863089	USAO-VB-00863089
30	USAO-VB-00866469	USAO-VB-00866471
31	USAO-VB-00867416	USAO-VB-00867418
32	USAO-VB-00868113	USAO-VB-00868114
33	USAO-VB-00870450	USAO-VB-00870452
34	USAO-VB-00871072	USAO-VB-00871072
35	USAO-VB-00871392	USAO-VB-00871392
36	USAO-VB-00871914	USAO-VB-00871917
37	USAO-VB-00874565	USAO-VB-00874566
38	USAO-VB-00875150	USAO-VB-00875151
39	USAO-VB-00875333	USAO-VB-00875336
40	USAO-VB-00876706	USAO-VB-00876706
41	USAO-VB-00878343	USAO-VB-00878343
42	USAO-VB-00888579	USAO-VB-00888581
43	USAO-VB-00890373	USAO-VB-00890375
44	USAO-VB-00895705	USAO-VB-00895706
45	USAO-VB-00896155	USAO-VB-00896158
46	USAO-VB-00896180	USAO-VB-00896184
47	USAO-VB-00896420	USAO-VB-00896420
48	USAO-VB-00896434	USAO-VB-00896435
49	USAO-VB-00901565	USAO-VB-00901565
50	USAO-VB-00903166	USAO-VB-00903167
51	USAO-VB-00907468	USAO-VB-00907472
52	USAO-VB-00908697	USAO-VB-00908698

<b>Exhibit</b>	<b>Bates Begin</b>	<b>Bates End</b>
53	USAO-VB-00908728	USAO-VB-00908730
54	USAO-VB-00908906	USAO-VB-00908908
55	USAO-VB-00909632	USAO-VB-00909633
56	USAO-VB-00910339	USAO-VB-00910339
57	USAO-VB-00913639	USAO-VB-00913641
58	USAO-VB-00916901	USAO-VB-00916901
59	USAO-VB-00925261	USAO-VB-00925262
60	USAO-VB-00947021	USAO-VB-00947022
61	USAO-VB-00953440	USAO-VB-00953440
62	USAO-VB-00954663	USAO-VB-00954663
63	USAO-VB-00961412	USAO-VB-00961415
64	USAO-VB-00965099	USAO-VB-00965100
65	USAO-VB-00965101	USAO-VB-00965103
66	USAO-VB-00966880	USAO-VB-00966881
67	USAO-VB-00969364	USAO-VB-00969365
68	USAO-VB-00973796	USAO-VB-00973797
69	USAO-VB-00997870	USAO-VB-00997870
70	VB-RECORDS-00462512	VB-RECORDS-00462513
71	VB-RECORDS-00462514	VB-RECORDS-00462517
72	VB-RECORDS-00462518	VB-RECORDS-00462518
73	VB-RECORDS-00465317	VB-RECORDS-00465317
74	VB-RECORDS-00465318	VB-RECORDS-00465319
75	VB-RECORDS-00465320	VB-RECORDS-00465320
76	VB-RECORDS-00465322	VB-RECORDS-00465325
77	VB-RECORDS-00465327	VB-RECORDS-00465330
78	VB-RECORDS-00465331	VB-RECORDS-00465333
79	VB-RECORDS-00465334	VB-RECORDS-00465336
80	VB-RECORDS-00465340	VB-RECORDS-00465342
81	VB-RECORDS-00465345	VB-RECORDS-00465353
82	VB-RECORDS-00465354	VB-RECORDS-00465395
83	KHOURY_USAO-000061	KHOURY_USAO-000061
84	KHOURY-00000002	KHOURY-00000002
85	KHOURY-00000003	KHOURY-00000007
86	KHOURY-00000016	KHOURY-00000017
87	KHOURY-00000020	KHOURY-00000022
88	KHOURY-00000034	KHOURY-00000035
89	KHOURY-00000036	KHOURY-00000040
90	KHOURY-00000044	KHOURY-00000044
91	KHOURY-00000047	KHOURY-00000047
92	KHOURY-00000070	KHOURY-00000070

<b>Exhibit</b>	<b>Bates Begin</b>	<b>Bates End</b>
93	KHOURY-00000093	KHOURY-00000093
94	KHOURY-00000095	KHOURY-00000096
95	KHOURY-00000097	KHOURY-00000098
96	KHOURY-00000099	KHOURY-00000100
97	KHOURY-00000101	KHOURY-00000102
98	KHOURY-00000103	KHOURY-00000103
99	KHOURY-00000104	KHOURY-00000108
100	KHOURY-00005416	KHOURY-00005416
101	KHOURY-00005431	KHOURY-00005431
102	KHOURY-00005437	KHOURY-00005437
103	KHOURY-00005438	KHOURY-00005444
104	KHOURY-00005445	KHOURY-00005449
105	KHOURY-00005428	KHOURY-00005430
106	KHOURY-00005432	KHOURY-00005433
107	KHOURY-00005490	KHOURY-00005495
108	KHOURY-00005496	KHOURY-00005501
109	KHOURY-00005502	KHOURY-00005503
110	KHOURY-00005504	KHOURY-00005506
111	KHOURY-00005507	KHOURY-00005508
112	KHOURY-00005509	KHOURY-00005514
113	KHOURY-00005515	KHOURY-00005516
114	KHOURY-00005517	KHOURY-00005519
115	KHOURY-00005520	KHOURY-00005520
116	KHOURY-00007524	KHOURY-00007524
117	KHOURY-00007535	KHOURY-00007535
118	KHOURY-00007536	KHOURY-00007536
119	KHOURY-00007537	KHOURY-00007537
120	KHOURY-00007543	KHOURY-00007544
121	KHOURY-00007546	KHOURY-00007548
122	KHOURY-00007550	KHOURY-00007550
123	KHOURY-00007569	KHOURY-00007571
124	KHOURY-00007572	KHOURY-00007574
125	KHOURY-00007597	KHOURY-00007598
126	KHOURY-00007600	KHOURY-00007600
127	KHOURY-00007602	KHOURY-00007603
128	KHOURY-00007610	KHOURY-00007610
129	KHOURY-00007627	KHOURY-00007628
130	KHOURY-00007644	KHOURY-00007645
131	KHOURY-00007647	KHOURY-00007648
132	KHOURY-00007671	KHOURY-00007671
133	KHOURY-00007684	KHOURY-00007684

<b>Exhibit</b>	<b>Bates Begin</b>	<b>Bates End</b>
134	KHOURY-00007743	KHOURY-00007744
135	KHOURY-00007747	KHOURY-00007747
136	KHOURY-00007756	KHOURY-00007756
137	KHOURY-00007798	KHOURY-00007798
138	KHOURY-00007842	KHOURY-00007842
139	KHOURY-00007843	KHOURY-00007845
140	KHOURY-00007847	KHOURY-00007847
141	KHOURY-00007865	KHOURY-00007865
142	KHOURY-00007872	KHOURY-00007872
143	KHOURY-00007873	KHOURY-00007875
144	KHOURY-00007897	KHOURY-00007900
145	KHOURY-00007946	KHOURY-00007947
146	KHOURY-00007962	KHOURY-00007962
147	KHOURY-00007969	KHOURY-00007969
148	KHOURY-00007974	KHOURY-00007974
149	KHOURY-00007975	KHOURY-00007976
150	KHOURY-00007986	KHOURY-00007986
151	KHOURY-00007995	KHOURY-00007996
152	KHOURY-00008011	KHOURY-00008011
153	KHOURY-00008074	KHOURY-00008074
154	KHOURY-00008076	KHOURY-00008077
155	KHOURY-00008192	KHOURY-00008192
156	KHOURY-00008193	KHOURY-00008204
157	KHOURY-00008218	KHOURY-00008219
158	KHOURY-00008221	KHOURY-00008221
159	KHOURY-00008523	KHOURY-00008524
160	KHOURY-00008670	KHOURY-00008671
161	KHOURY-00008722	KHOURY-00008722
162	KHOURY-00008779	KHOURY-00008781
163	KHOURY-00008806	KHOURY-00008806
164	KHOURY-00008810	KHOURY-00008810
165	KHOURY-00008827	KHOURY-00008827
166	KHOURY-00009205	KHOURY-00009206
167	KHOURY-00009207	KHOURY-00009208
168	KHOURY-00009209	KHOURY-00009209
169	KHOURY-00009211	KHOURY-00009211
170	KHOURY-00009218	KHOURY-00009219
171	KHOURY-00009220	KHOURY-00009221
172	KHOURY-00009315	KHOURY-00009316
173	KHOURY-00009341	KHOURY-00009341
174	KHOURY-00009369	KHOURY-00009369

<b>Exhibit</b>	<b>Bates Begin</b>	<b>Bates End</b>
175	KHOURY-00009415	KHOURY-00009416
176	KHOURY-00009423	KHOURY-00009424
177	KHOURY-00009427	KHOURY-00009427
178	KHOURY-00009428	KHOURY-00009428
179	KHOURY-00009436	KHOURY-00009436
180	KHOURY-00009608	KHOURY-00009609
181	KHOURY-00009636	KHOURY-00009638
182	KHOURY-00009639	KHOURY-00009640
183	KHOURY-00009692	KHOURY-00009693
184	KHOURY-00009720	KHOURY-00009720
185	KHOURY-00009723	KHOURY-00009723
186	KHOURY-00009729	KHOURY-00009730
187	KHOURY-00009737	KHOURY-00009737
188	KHOURY-00010120	KHOURY-00010120
189	KHOURY-00010127	KHOURY-00010129
190	KHOURY-00010148	KHOURY-00010148
191	KHOURY-00010149	KHOURY-00010149
192	KHOURY-00010154	KHOURY-00010155
193	KHOURY-00010179	KHOURY-00010180
194	KHOURY-00010236	KHOURY-00010237
195	KHOURY-00010277	KHOURY-00010277
196	KHOURY-00010285	KHOURY-00010286
197	KHOURY-00010287	KHOURY-00010287
198	KHOURY-00010299	KHOURY-00010300
199	akhoury_000166974	akhoury_000166974
200	akhoury_000166975	akhoury_000166976
201	akhoury_000173051	akhoury_000173052
202	akhoury_000176782	akhoury_000176785
203	akhoury_000183552	akhoury_000183554
204	akhoury_000188097	akhoury_000188097
205	akhoury_000188098	akhoury_000188103
206	akhoury_000209258	akhoury_000209258
207	akhoury_000211113	akhoury_000211114
208	akhoury_000211118	akhoury_000211118
209	akhoury_000313076	akhoury_000313077
210	RDK00000046	RDK00000048
211	RDK00000049	RDK00000058
212	RDK00000059	RDK00000080
213	RDK00000081	RDK00000086
214	RDK00000087	RDK00000088
215	RDK00000089	RDK00000089

<b>Exhibit</b>	<b>Bates Begin</b>	<b>Bates End</b>
216	RDK00000090	RDK00000090
217	RDK00000091	RDK00000091
218	RDK00000092	RDK00000092
219	RDK00000093	RDK00000093
220	RDK00000094	RDK00000094
221	RDK00000095	RDK00000095
222	RDK00000096	RDK00000096
223	RDK00000097	RDK00000098
224	RDK00000099	RDK00000100
225	RDK00000101	RDK00000101
226	RDK00000102	RDK00000103
227	RDK00000185	RDK00000200
228	RDK00000201	RDK00000201
229	RDK00000202	RDK00000202
230	RDK00000203	RDK00000203
231	RDK00000204	RDK00000204
232	RDK00000205	RDK00000312
233	RDK00000313	RDK00000339
234	RDK00000340	RDK00000385
235	RDK00000386	RDK00000464
236	RDK00000465	RDK00000510
237	RDK00000511	RDK00000594
238	RDK00000595	RDK00000662
239	RDK00000663	RDK00000722
240	RDK00000723	RDK00000770
241	RDK00000771	RDK00000916
242	RDK00000917	RDK00001074
243	RDK00001075	RDK00001212
244	RDK00001213	RDK00001218
245	RDK00001219	RDK00001224
246	RDK00001225	RDK00001230
247	RDK00001231	RDK00001236
248	RDK00001237	RDK00001242
249	RDK00001243	RDK00001248
250	RDK00001249	RDK00001254
251	RDK00001255	RDK00001260
252	RDK00001261	RDK00001266
253	RDK00001267	RDK00001272
254	RDK00001273	RDK00001312
255	RDK00001313	RDK00001314

Exhibit	Bates Begin	Bates End
256	RDK00001315	RDK00001316
257	RDK00001317	RDK00001318
258	RDK00001319	RDK00001319
259	RDK00001320	RDK00001322
260	RDK00001323	RDK00001323
261	RDK00001324	RDK00001324
262	RDK00001325	RDK00001325
263	RDK00001326	RDK00001326
264	RDK00001327	RDK00001341
265	RDK00001342	RDK00001344
266	RDK00001345	RDK00001346
267	RDK00001347	RDK00001347
268	RDK00001348	RDK00001348
269	RDK00001349	RDK00001349
270	RDK00001350	RDK00001350
271	RDK00001351	RDK00001351
272	RDK00001352	RDK00001352
273	RDK00001353	RDK00001353
274	RDK00001354	RDK00001354

Respectfully submitted,

AMIN KHOURY

By his attorneys,

/s/ Eóin P. Beirne

R. Robert Popeo (BBO #403360)  
Mark E. Robinson (BBO #423080)  
Cory S. Flashner (BBO #629205)  
Eóin P. Beirne (BBO #660885)  
Mathilda S. McGee-Tubb (BBO #687434)  
MINTZ, LEVIN, COHN, FERRIS,  
GLOVSKY AND POPEO, P.C.  
One Financial Center  
Boston, MA 02111  
(617) 542-6000  
RRPopeo@mintz.com  
MERobinson@mintz.com  
CSFlashner@mintz.com  
EPBeirne@mintz.com  
MSMcGee-Tubb@mintz.com

Dated: March 8, 2022



**CERTIFICATE OF SERVICE**

I, Eóin P. Beirne, counsel for the Defendant, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF, and paper copies will be sent to those indicated as non-registered participants on March 8, 2022.

/s/ Eóin P. Beirne

Eóin P. Beirne

122921456v.1